

EXHIBIT K  
JACQUELYN SALVADOR DEPOSITION

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

ALBERT SIDNEY JOHNSTON )  
Chapter No. 2060, United )  
Daughters of the )  
Confederacy, ROBIN )  
TERRAZAS, President, JEAN )  
CAROL LANE, First )  
Vice-President, )  
PLAINTIFFS, )

VS. ) CIVIL ACTION NO.  
THE CITY OF SAN ANTONIO, ) SA-17-CV-1072-DAE  
DEFENDANT. )

ORAL DEPOSITION OF  
JACQUELYN C. SALVADOR  
JULY 25, 2018

ORAL DEPOSITION of JACQUELYN C. SALVADOR, produced  
as a witness at the instance of the Plaintiffs, and  
duly sworn, was taken in the above-styled and numbered  
cause on the 25th day of July, 2018, from 2:31 p.m. to  
3:21 p.m., before Sharon L. McDonald, CSR, in and for  
the State of Texas, reported by machine shorthand, at  
the offices of City of San Antonio, 100 W. Houston,  
19th Floor, San Antonio, Texas, pursuant to the  
Federal Rules of Civil Procedure and the provisions  
stated on the record or attached hereto.

HILL COUNTRY COURT REPORTERS  
(210) 691-1633

Appearances..... 2  
JACQUELYN C. SALVADOR  
Examination by Mr. Crane..... 4  
Changes and Signature Page..... 35  
Court Reporter's Certificate..... 36

EXHIBITS INDEX		
NO.	DESCRIPTION	PAGE
Exhibit 1	Email Communications (ASJ000042 - ASJ000048).....	7
Exhibit 2	March 27, 1899, Typed Minutes, City Council (ASJ000020).....	16
Exhibit 3	March 27, 1899, Handwritten Minutes, City Council with plat (COSA000059 - COSA000060, COSA000035).....	17
Exhibit 4	Handwritten Ordinance March 27, 1899 (ASJ000099 - ASJ000100).....	23
Exhibit 5	Newspaper Article, (COSA000076).....	26
Exhibit 6	Handwritten Minutes, 03/27/1899 (COSA000028).....	27
Exhibit 7	San Antonio Daily Express, June 4, 1899 (ASJ000275 - ASJ000276).....	29
Exhibit 8	Cultural Resource Survey (COSA0000100 - COSA0000101).....	31
Exhibit 9	Monument History (COSA0000589 - COSA0000592).....	31

HILL COUNTRY COURT REPORTERS  
(210) 691-1633

APPEARANCES  
FOR THE PLAINTIFF(S):

MR. THOMAS J. CRANE  
LAW OFFICE OF THOMAS J. CRANE  
110 Broadway, Suite 420  
San Antonio, Texas 78205  
(210) 736-1110  
tjcoffice3649@sbcglobal.net

FOR THE DEFENDANT(S):

MR. SHAWN FITZPATRICK  
FITZPATRICK & KOSANOVICH, P.C.  
P.O. Box 831121  
San Antonio, Texas 78283  
(210) 207-7259  
skf@fitzkoslaw.com

ALSO PRESENT:

Robin Terrazas  
Jean Lane  
Jacquelyn C. Sandoval, the Witness  
Sharon L. McDonald, CSR

HILL COUNTRY COURT REPORTERS  
(210) 691-1633

JACQUELYN C. SALVADOR,

having been first duly sworn, testified as follows:

EXAMINATION

BY MR. CRANE:

Q Ms. Salvador, as I mentioned, I'm Tom Crane. I  
represent the Daughters of the Confederacy, the Albert  
Sidney Johnston Chapter.

Would you state your name for the record,  
please?

A Jacquelyn C. Salvador.

Q How are you employed, Ms. Salvador?

A I'm with the office of the city clerk, the  
archives and records -- municipal archives and records  
division, librarian assistant.

Q So are you with archives or with the library or  
both?

A No. With archives.

Q Okay. Does that have something to do with the  
San Antonio Public Library?

A No, they're separate.

Q They're separate.

A They're separate.

Q So you mentioned library. Is that part of your  
job title?

A Yes. It is part of my job title.

HILL COUNTRY COURT REPORTERS  
(210) 691-1633

HILL COUNTRY COURT REPORTERS  
(210) 691-1633

1 Bryan Callaghan was mayor?  
A I would say yes.  
Q Can you look at the bottom, please, and it says -- there's a signature, and then in the lower left-hand corner it looks like it says, Approved March 27, 1899. Did I read that accurately?  
A I'm sorry. Did you say March 27, 1899?  
Q Yes, ma'am. That's my best guess.  
A Yeah.  
Q And then below it, can you read that writing?  
A Marshall Hicks, Mayor.  
Q Again, I defer to you because I know you've probably read these old things a lot more than I have.  
A (Reading):  
Q Be it ordained by the city council of the City of San Antonio.  
Q If you come --  
A I'm sorry.  
Q If you come to a word you don't understand, you can just say, There's a word I don't --  
A (Reading):  
Q Whereas, the Daughters of the Confederacy have petitioned your honor body for two blocks of land -- don't know -- to their cemetery. I

24

HILL COUNTRY COURT REPORTERS  
(210) 691-1633

1 A A certified copy of a portion of the minutes.  
Q Do you know who Marshall -- well, it says Marshall Hicks, mayor, at the bottom. Were you aware of a mayor named Marshall Hicks?  
A No.  
Q And at the top it says, Regular meeting of the city council, the City of San Antonio, Monday, March 27, 1899. Does this suggest to you that this is a record from a meeting of the city council on Monday, March 27, 1899?  
A Yes.  
Q Does this indicate to you that the City passed an ordinance agreeing to the request of the Daughters of the Confederacy?  
MR. FITZPATRICK: Objection, legal conclusion.  
Q (BY MR. CRANE) You can answer.  
A Yes.  
Q As a person trained in municipal archives and how to take care of them, are you familiar with certified copies?  
A Vaguely, yes.  
Q This format at the bottom where they certified, have you seen that format before?  
A Yes.

22

HILL COUNTRY COURT REPORTERS  
(210) 691-1633

1 Q And can you make out the date at the bottom of the certification?  
A December 10th of -- I'm not too sure of the first two numbers, but '53.  
Q Do you think that was 1953?  
A I believe so.  
Q I mean, as a person familiar with municipal archives, you probably know this already, but there wasn't typewriting in 1853, or was there?  
A I cannot tell you yes or no to that. I'm not too sure.  
(Exhibit 4 marked.)  
Q (BY MR. CRANE) I'm showing you what's marked Exhibit Number 4, and ask you if you remember seeing this before.  
A Yes.  
Q Do you remember when you saw that?  
A Yes.  
Q Is this something Mrs. Terrazas sent you?  
A No.  
Q When did you see this before?  
A Around the beginning of my research.  
Q And it has this letterhead. It looks like it's from -- well, it says Bryan Callaghan, Mayor. Does that suggest to you this was probably letterhead used when

23

HILL COUNTRY COURT REPORTERS  
(210) 691-1633

1 Q And if you look below that, can you see the words, "Sidewalks have already been laid," maybe?  
A Yes.  
Q Do you have any recollection as to what this represents?  
A It looks like a plat survey of Travis Park.  
Q And the center might be where the Travis Park memorial used to be?  
A I would say yes.  
Q And if you look at the third page, it's really the same handwritten minute entry, but it seemed to have a better capture of the numbers at the top, so I included it.  
Q So just to make sure that I'm straight, the handwritten portion, the first page, you remember seeing that in the minute entries, is that correct?  
A Yes.  
Q So if I could ask you to look at Exhibit Number 2 again. That's this one here. That's the typed version. I know I asked you this, but I can't remember your answer. Do you remember seeing this from -- do you remember receiving this from Robin Terrazas?  
A Yes.  
Q What did you understand this to be when you received it from Mrs. Terrazas?

21

1 Q Could you say your job title one more time?  
 2 A Librarian assistant.  
 3 Q But you work in municipal archives?  
 4 A Yes.  
 5 Q So you're responsible for the City's archives?  
 6 A Not responsible, but help.  
 7 Q Well, you work with them.  
 8 A Yes, I do.  
 9 Q What do your job duties include?  
 10 A Digitizing, scanning, making records readily  
 11 available in our digital collection for the public and,  
 12 of course, internal City of San Antonio to have the  
 13 records readily available.  
 14 Q Is that a large department?  
 15 A We're a department of three.  
 16 Q Three?  
 17 A Division of three.  
 18 Q What's the division called?  
 19 A Municipal archives and records.  
 20 Q And there are three employees there?  
 21 A Yes.  
 22 Q So you guys would be experts in, I guess,  
 23 archives and how to take care of them?  
 24 MR. FITZPATRICK: Objection. Calls for a  
 25 legal conclusion.

HILL COUNTRY COURT REPORTERS  
(210) 691-1633

1 from the city attorney's office.  
 2 A No.  
 3 Q Has anybody suggested to you what you should say  
 4 today?  
 5 A No.  
 6 Q Have you ever met Robin Terrazas face to face?  
 7 A No.  
 8 Q But you did exchange a few emails apparently.  
 9 A Yes.  
 10 Q Is that right?  
 11 A Yes, sir.  
 12 (Exhibit 1 marked.)  
 13 Q (BY MR. CRANE) I'm showing you what's marked  
 14 Exhibit 1, which I think is some or maybe all of those  
 15 emails between you and Robin Terrazas. I just ask you to  
 16 look at that for a minute.  
 17 A (Reviews document.)  
 18 Q I think if you go to the third page, there's an  
 19 email dated at the very bottom of the Page 08/30 of 2017  
 20 from you to Cathy Sadler. The third page. It's got 0044  
 21 in the lower right-hand corner.  
 22 A Uh-huh.  
 23 Q It says it's from you to Sadler, Scannell and  
 24 Robinmusic. It says, Good morning. That looks like  
 25 that's maybe your first email --

HILL COUNTRY COURT REPORTERS  
(210) 691-1633

1 Q (BY MR. CRANE) Is that your job to take care of  
 2 archives?  
 3 A Yes.  
 4 Q Do you receive training on how to do that?  
 5 A We do.  
 6 Q What kind of training have you received in how  
 7 to take care of archives?  
 8 A We take records management training when it  
 9 comes to records retention. When it comes to archives,  
 10 whatever webinars or seminars are available through the  
 11 Texas State Library and Archives Commission.  
 12 Q How long have you been working in municipal  
 13 archives?  
 14 A Ten years.  
 15 Q Have you ever been deposed before like you're  
 16 doing here today?  
 17 A No.  
 18 Q Do you understand that if you don't answer a  
 19 question -- if you don't understand a question, you  
 20 shouldn't answer it?  
 21 A Yes.  
 22 Q Has anybody discussed with you what you should  
 23 say today other than -- well, let me rephrase that.  
 24 Have you discussed your testimony with  
 25 anyone today other than with Mr. Fitzpatrick or someone

HILL COUNTRY COURT REPORTERS  
(210) 691-1633

1 A Yes.  
 2 Q -- to Robin Terrazas? Yes?  
 3 A Yes, sir.  
 4 Q Do you remember how you got the name of Robin  
 5 Terrazas?  
 6 A Through a google search.  
 7 Q How did you get her email address?  
 8 A I google searched for the Barnard E. Bee  
 9 Chapter.  
 10 Q Looking at this today, do you know if this was  
 11 your first email to someone with the local chapter of the  
 12 Daughters of the Confederacy?  
 13 A Yes.  
 14 Q And you see the email is dated August 3rd. Do  
 15 you think it was about that time when you made contact  
 16 with someone from the local chapter of the Daughters of  
 17 the Confederacy?  
 18 A That would be.  
 19 Q And why did you want to make contact with the  
 20 Daughters of the Confederacy?  
 21 A I was requested to do research and find  
 22 information pertaining to Travis Park and the monument.  
 23 Q What were you asked to research specifically?  
 24 Just in general or something specific?  
 25 A I was asked to do research within the minutes,

HILL COUNTRY COURT REPORTERS  
(210) 691-1633



1 ordinances, resolutions, and any other documentation that  
 2 would refer to Travis Park or the monument.  
 3 Q And who asked you to do that?  
 4 A My supervisor.  
 5 Q Which is who?  
 6 A Melinda Uriegas.  
 7 Q Could you spell Uriegas for the court reporter  
 8 and for myself?  
 9 A U-R-I-E-G-A-S.  
 10 Q Do you know who asked her to do the research?  
 11 A No, I do not.  
 12 Q When you gathered this research, what would you  
 13 do with it?  
 14 A We are -- we were creating a subject matter  
 15 folder for future references and research.  
 16 Q Do you know who it was for?  
 17 A For no one. It was just part of our archive  
 18 collection.  
 19 Q So when you gathered this research, what would  
 20 you do with it, just put it in a folder?  
 21 A We put it in a folder and we place it in the  
 22 filing cabinet for research.  
 23 Q Where is the filing cabinet?  
 24 A In the municipal archives and records facility.  
 25 Q So it's within where you normally work?

HILL COUNTRY COURT REPORTERS  
 (210) 691-1633

1 Q When Ms. Terrazas sent you that, was there  
 2 anything among her papers that explained this Confederate  
 3 hospital background?  
 4 A I do not recall.  
 5 Q And then she mentions it was documented in a  
 6 Standing Structures Survey completed for the VIA  
 7 Metropolitan Transit. Do you have any familiarity with  
 8 the Standing Structures Survey done by VIA in 2015?  
 9 A No, I do not.  
 10 Q Do you understand whether or not this is true  
 11 that there was a Confederate hospital on Travis Park?  
 12 A No, I do not know.  
 13 Q Do you remember what Robin Terrazas sent you as  
 14 information about the monument?  
 15 A Well, from what it says in the email, minutes at  
 16 the Texas Convention from 1897, 1898, 1900, 1901, and  
 17 1972.  
 18 Q Do you remember anything else she sent you?  
 19 A I apologize. I'm going to have to read through  
 20 this.  
 21 Q Take your time. There's no hurry.  
 22 A (Reviews document.) I apologize. I believe  
 23 there is something, but I'm looking for the little icon  
 24 symbol to show that something would have been sent with  
 25 it.

HILL COUNTRY COURT REPORTERS  
 (210) 691-1633

10

1 A Yes, sir.  
 2 Q Would you look at the first page of this  
 3 exhibit. It's got a number 0042 in the lower right-hand  
 4 corner.  
 5 A Uh-huh.  
 6 Q And so this email is dated August 5th. So, I  
 7 mean, you can refresh your memory if you'd like, but  
 8 apparently you and Robin have exchanged a few emails. So  
 9 if it's dated August 5th, do you think you received it  
 10 probably on August 5th?  
 11 A I believe I would have, yes, on that date.  
 12 Q And other than receiving the email, would you do  
 13 anything with the -- well, let me rephrase that.  
 14 If you read through the email, she's  
 15 talking about sending you an attachment that includes  
 16 some things, for example, the chapter members of the  
 17 Barnard Bee Chapter, list of charter members, some  
 18 minutes. You would put those in the file that you were  
 19 collecting? Is that what you would do?  
 20 A Yes.  
 21 Q And then at the bottom it says, As an aside, I  
 22 think it's important to point out that the property once  
 23 served as a Confederate hospital. Do you see that  
 24 sentence?  
 25 A Yes, sir.

HILL COUNTRY COURT REPORTERS  
 (210) 691-1633

12

1 Q Yeah. I don't see any icons here for what was  
 2 attached. I'm just asking what you remember. You're  
 3 welcome to look through the emails and see what else  
 4 there may be. I think the one thing you haven't  
 5 mentioned is a petition for -- from the City for lands,  
 6 something like that? I'm just asking what you recall.  
 7 It's not a trick question. It's just asking what you  
 8 remember.  
 9 A No. Without physically seeing any of the  
 10 attachments, I would not remember. I apologize.  
 11 Q Would you look at the -- one, two, three,  
 12 four -- the fifth page, it has a 0046 in the lower  
 13 right-hand corner.  
 14 A Yes.  
 15 Q And if you look, there's an email from you to  
 16 Robin, and it says:  
 17 Our office is trying to gather as much  
 18 information on this property and the monument in  
 19 place not only for preservation purposes, but also a  
 20 learning tool for our City to make the right  
 21 decision.  
 22 Is this based -- when you're explaining why  
 23 you want this, is this based on something Ms. Uriegas  
 24 told you?  
 25 A No.

HILL COUNTRY COURT REPORTERS  
 (210) 691-1633

17  
1 but it's something a little bit different? Document 103-11  
2 A This is actually part of the minutes and not --  
3 not in our ordinance book, but it is in minutes.  
4 (Exhibit 3 marked.)  
5 Q (BY MR. CRANE) I'm showing you what's marked  
6 Exhibit Number 3. It has what we call Bates numbers in  
7 the lower right-hand corner.  
8 A Uh-huh.  
9 Q I had to hand write those. For whatever reason,  
10 the numbers would not print out. But these were produced  
11 by the City to us. And can you read that handwriting?  
12 It's hard to read, I know, handwriting from 100 years  
13 ago. Can you read that handwriting?  
14 A Yes.  
15 Q Can you read into the record what it says?  
16 A Of course. (Reading):  
17 Petition of the Daughters of the  
18 Confederacy for permission to erect a monument in  
19 Travis Park. In this connection, Alderman Rheine  
20 introduced the following ordinance. Be it ordained  
21 by the city council of the City of San Antonio that  
22 permission be and is hereby granted to the Daughters  
23 of the Confederacy to use the amount of land  
24 petitioned for in the center of said Travis Park and  
25 that the city engineer -- sorry that's blank --

HILL COUNTRY COURT REPORTERS  
(210) 691-1633

19  
1 A Yes. Filed 11/07/18 Page 6 of 7  
2 Q Were you able to find that ordinance?  
3 A Not the ordinance.  
4 Q Do you remember looking for it?  
5 A Yes.  
6 Q And it even has a page number. Do you have any  
7 recollection of why you were not able to find it?  
8 A I don't believe the wording was the same. I'm  
9 sorry. I do not know.  
10 Q Is the ordinance book JM-491, does it still  
11 exist?  
12 A Yes, it does.  
13 Q And when you look at Page 757, do you remember  
14 what you would see?  
15 A Not off the top of my head. I don't remember.  
16 Q But if there was a copy of the ordinance itself,  
17 presumably you would have found it, correct?  
18 A Yes.  
19 Q Because that was -- that was your research  
20 project?  
21 A Yes.  
22 Q How long did you spend looking for information  
23 about the Travis Park memorial?  
24 A Anywhere between two to three weeks.  
25 Q Do you remember when you first started doing

HILL COUNTRY COURT REPORTERS  
(210) 691-1633

18  
1 hereby ordered to survey and define said plot of land  
2 at once. The ordinance was adopted unanimously.  
3 Q Would you describe this as a minute or as an  
4 ordinance?  
5 A This is a minute.  
6 Q Can you define what you mean by -- what a minute  
7 entry is?  
8 A A minute entry takes note of everything that  
9 happens within the council meeting. And the reason I say  
10 it's a minute is because of the reference number that is  
11 on there.  
12 Q What's the reference number?  
13 A Ordinance Book JM-491, which is journal minutes.  
14 Q So that refers -- so I mean, I really have  
15 almost no understanding of minutes and ordinances as kept  
16 by the City, so if my questions sound dumb it's because  
17 I'm somewhat dumb about these kind of things. So is  
18 this -- you see this as a minute entry, but it has a  
19 reference to an ordinance book?  
20 A Yes.  
21 Q What does that indicate, that it has a reference  
22 to an ordinance book?  
23 A Meaning an ordinance was passed.  
24 Q And if somebody wanted to go find it, they would  
25 go look in ordinance book JM-491?

HILL COUNTRY COURT REPORTERS  
(210) 691-1633

20  
1 that?  
2 A Around the same time that I sent Ms. Robin the  
3 email.  
4 Q Would you look at the second page of Exhibit  
5 Number 3? Do you remember seeing this -- I'm not sure  
6 what to call it. It looks like an outline of Travis  
7 Park. Do you remember seeing this before?  
8 A It's hard to make out.  
9 Q If you look at the bottom third of the gray  
10 part, it says -- you can see, more or less, Travis  
11 Street.  
12 A Uh-huh.  
13 Q And then above it there's a big circle. Is it  
14 possible this represents Travis Park?  
15 MR. FITZPATRICK: Objection, calls for  
16 speculation.  
17 Q (BY MR. CRANE) You can still answer.  
18 A Yes.  
19 Q Do you remember seeing this before?  
20 A There's one similar.  
21 Q You have a fuzzy memory, apparently, of this?  
22 A I believe this might be a shorter version.  
23 Q If you look in the very middle of the circle,  
24 can you see the words "Travis Park"?  
25 A Yes.

HILL COUNTRY COURT REPORTERS  
(210) 691-1633

REGULAR MEETING OF THE CITY  
COUNCIL OF THE CITY OF SAN  
ANTONIO, MONDAY, MARCH 27, 1899

PRESENT: Mayor Marshall Hicks  
Aldermen Alexander, Barker, Davis, Lamm, Mahncke,  
Mumme, O'Connor, Piper, Rheiner, Richter, Surkey  
and Thiele

\*\*\*\*\*

Petition of the Daughters of the Confederacy for permission  
to erect a monument in Travis Park. In this connection Ald.  
Rheiner introduced the following ordinance.

Be it ordained by the City Council of the City of San Antonio  
that permission be and is hereby granted to the Daughters of  
the Confederacy to use the amount of land petitioned for in the  
center of said Travis Park and that the City Engineer be hereby  
ordered to survey and define said plat of land at once.

The ordinance was adopted unanimously.

\*\*\*\*\*

On motion the Council adjourned.

APPROVED:

/s/ Marshall Hicks  
Mayor

ATTEST:  
/s/ W. W. Johnson.  
City Clerk

STATE OF TEXAS  
COUNTY OF BEXAR  
CITY OF SAN ANTONIO

} SS.

CERTIFIED COPY

The undersigned, the City Clerk of the City of San Antonio, in the State and County above  
said, do hereby certify that the within and foregoing ordinance, as the same appears from the  
minutes of the City Council of the City of San Antonio, is a true and correct copy of the same  
as the same appears from the minutes of the City Council of the City of San Antonio.

Given under my hand and the official seal of the City of San Antonio, this 10

day of December A. D. 1953

(SEAL)

*Elmer W. Starbuck*  
City Clerk

